

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

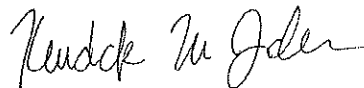
|   |   |                              |
|---|---|------------------------------|
| -----X  |   |                              |
| IN RE:  | : | 22-md-3028 (PAE)             |
|   | : |                              |
| ONE APUS CONTAINER SHIP INCIDENT ON                     | : | Hon. Paul A. Engelmayer      |
| NOVEMBER 30, 2020                                       | : |                              |
|   | : |                              |
| <i>This Document Relates To:</i>                        | : | <b>NOTICE OF PLAINTIFFS'</b> |
| <i>AIT Worldwide Logistics, Inc., et al. v. M/V ONE</i> | : | <b>MOTION FOR LEAVE TO</b>   |
| <i>APUS, in rem, et al., C.A. 1:22-05220.</i>           | : | <b>FILE FIRST AMENDED</b>    |
|   | : | <b>COMPLAINT</b>             |
| -----X  |   |                              |

PLEASE TAKE NOTICE that Plaintiffs, AIT Worldwide Logistics, Inc. ("AIT"), TopOcean Consolidation Service (Los Angeles), Inc. ("TopOcean"), and Worldbridge Logistics, Inc. ("Worldbridge"), will move pursuant to Rule 15(a) and Rule 21 of the Federal Rules of Civil Procedure before the Hon. Paul A. Engelmayer, U.S.D.J. for the Southern District of New York at 40 Foley Square, New York, New York 10007, for an Order granting Plaintiffs Leave to File their Motion for Leave to File their First Amended Verified Complaint adding Defendants, Chidori Ship Holding LLC, Jessica Ship Holdings LLC, and NYK Shipmanagement Pte Ltd.; and

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely upon the accompanying

Memorandum of Law.

September 29, 2022.




Robert L. Reeb – Admitted *Pro Hac Vice*  
Kenderick M. Jordan – Admitted *Pro Hac Vice*  
Marwedel, Minichello & Reeb, P.C.  
303 W. Madison St., Suite 1100  
Chicago, Illinois 60606  
P: (312) 902-1600  
F: (312) 902-9900  
[rreeb@mmr-law.com](mailto:rreeb@mmr-law.com)  
[kjordan@mmr-law.com](mailto:kjordan@mmr-law.com)

George W. Wright  
Narinder S. Parmar  
George W. Wright & Associates, LLC  
88 Pine Street, 7<sup>th</sup> Floor  
New York, New York 10005  
P: (201) 342-8884  
F: (201) 343-8869  
[gwright@wright-associate.com](mailto:gwright@wright-associate.com)  
[nparmar@wright-associate.com](mailto:nparmar@wright-associate.com)

*Attorneys for AIT Worldwide Logistics, Inc.;  
TopOcean Consolidation Service (Los  
Angeles), Inc.; and Worldbridge Logistics, Inc.*

Granted.

SO ORDERED.

  
\_\_\_\_\_  
PAUL A. ENGELMAYER  
United States District Judge  
September 30, 2022